

Pro Se 1 (Rev. 09/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

Jeremy Pinson

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:17-CV 584
 (to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

FILED
SCRANTON

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COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Jeremy Pinson

Street Address

1900 W. Sunshine

City and County

Springfield Greene

State and Zip Code

Missouri 65801

Telephone Number

N/A

E-mail Address

N/A

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

United States
Government
320 First St NW
Washington DC
N/A
N/A
N/A

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Federal Bureau of Prisons
Agency
320 First Street NW
Washington DC
N/A
N/A
N/A

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Elizabeth Santos
Clinical Director
Unknown
Allenwood
Pennsylvania 17887
N/A
N/A

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

8th Amendment
Federal Tort Claims Act

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Jeremy Pinson, is a citizen of the
State of (name) Missouri.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) Elizabete Santos, is a citizen of
the State of (name) Pennsylvania. Or is a citizen of
(foreign nation) _____.

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b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The amount in controversy is \$1,000,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Page

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See Page

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-17-17

Signature of Plaintiff

Printed Name of Plaintiff



Jeremy Pinson

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Statement of Claim =

- 1- Plaintiff was a male to female transgender inmate on hormone therapy at the United States Penitentiary in Allenwood, PA.
- 2- Defendant BOP denied plaintiff makeup while housed there.
- 3- On occasion a staff member issued plaintiff a razor but failed knowingly to collect the razor when plaintiff was finished shaving.
- 4- The staff member stated "I don't care I do my 8 hours and go home."
- 5- Plaintiff had a lengthy history known to staff that plaintiff mutilated her genitals.
- 6- Defendant Santos and the BOP without explanation to plaintiff permanently denied her sex reassignment surgery.
- 7- The razor issued by staff was used by plaintiff to self mutilate her genitals badly enough to require surgery and caused serious pain and suffering.
- 8- Plaintiff is a BOP Care Level 4 mental Health patient the highest, most serious designation.
- 9- The community standard of care for treatment of transgendered persons is the WPATH guidelines which BOP rejects in part.
- 10- Plaintiff most self-mutilates in solitary confinement. At present she has been in such confinement for 5 months.

Relief Requested:

1. Damages in the amount of \$ 1000000.00 against the United States
2. Damages in the amount of \$ 1.00 against defendant Santos.
3. Injunction requiring the Bureau of Prisons to permit the plaintiff the makeup she was permitted at her civil trial in FCI Greenville in 2016 to include foundation, mascara, dark pink lipstick.
4. Injunction requiring Sex reassignment surgery.

2620 Bellevue Way NE #200
Bellevue, WA 98004



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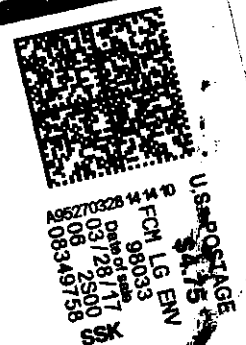
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SCRANTON

APR 03 2017

PER

DEBRA J. ERIK

U.S. District Court
235 North Washington Ave
PO Box 1148
Scranton, PA 18501



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